

September 15, 2003

Via Overnight Mail

Ms. Mary L. Cottrell
Secretary
Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

Re: D.T. E. 03-59 – Proceeding by the Department of Telecommunications and Energy on its own Motion to Implement the Requirements of the Federal Communications Commission’s Triennial Review Order Regarding Switching for Large Business Customers Served by High-Capacity Loops.

Dear Secretary Cottrell:

Pursuant to the Department of Telecommunications and Energy’s (“DTE’s”) August 26, 2003 *Vote and Order to Open Proceeding*, in the above captioned proceeding, Richmond Connections Inc., d.b.a. Richmond NetWorx (“NetWorx”) respectfully requests to participate in this DTE proceeding to implement the requirements of the Federal Communications Commission’s Triennial Review Order (“TRO”) Regarding Switching for Large Business Customers Served by High-Capacity Loops.

Richmond Connections Inc., d.b.a. Richmond NetWorx (“NetWorx”) is a full service, facilities-based competitive local exchange carrier (“CLEC”) serving rural Berkshire County, Massachusetts. As part of its facilities-based services in Pittsfield, Massachusetts, Richmond NetWorx contracts with Verizon New England Inc. d/b/a Verizon Massachusetts (“Verizon”) for unbundled network elements (“UNEs”) and collocation in Pittsfield for “last mile” connection to its own network. NetWorx does not purchase local switching from Verizon for the majority of its customers. However, there are some customers that NetWorx does serve via UNE Platform, and for this customer segment the removal of switching, as a UNE would clearly be detrimental. This group includes customers served by high-capacity loops and as such, any changes to the unbundling requirements would be detrimental to NetWorx and CLECs in general.

Alternatives to the switching UNE are extremely limited in nature. This is true regardless of the size of the customer being served by the CLEC. Given the flexibility that the FCC has provided in the review of impairment, NetWorx believes that an adjudicatory proceeding would best provide an opportunity for a complete review by the Department.

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Please direct any correspondence regarding this proceeding to:

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Should you have any questions, please feel free to contact me at any time. I can be reached at (413) 447-3787. You can contact Mr. Snyder at (610) 928-3944.

Respectfully,

Christa M. Proper
Vice President
Richmond Connections Inc.,
d.b.a. Richmond NetWorx

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